

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
NORTHERN DIVISION

**JOHNATHAN YASEVICH, et al.,  
Each Individually and on Behalf  
Of All Others Similarly Situated**

**PLAINTIFFS**

vs.

No. 3:20-cv-19-KGB

**THE HERITAGE COMPANY, INC.  
and SANDRA FRANECKE**

**DEFENDANTS**

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Named Plaintiff Johnathan Yasevich, individually and on behalf of all others similarly situated (together “Plaintiffs”), and Defendants The Heritage Company, Inc., and Sandra Franecke, by and through their respective undersigned counsel, submit the following for their Joint Stipulation of Dismissal with Prejudice:

1. Named Plaintiff brought this action against Defendant alleging violations of the overtime provisions of the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”), and the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* (“AMWA”), as well as violations of the Worker Adjustment and Retraining Notification Act (“the WARN Act”).

2. After arm’s length negotiations in which Plaintiffs and Defendants were represented by counsel, Plaintiffs and Defendants reached an agreement that resolves all claims in this lawsuit; Plaintiffs and Defendants believe their agreement is a fair, reasonable and adequate compromise of a bona fide dispute.

3. The parties now file this stipulation of dismissal with prejudice pursuant to Rule 41(a)(1)(A)(ii), which allows a case to be dismissed by stipulation if signed by all parties who have appeared.

4. The parties hereby stipulate to the dismissal of this action with prejudice, with each side to bear its own fees and costs, except as otherwise agreed upon.

5. The parties request that the Court retain jurisdiction of this matter for thirty (30) days for the limited purpose of enforcing the agreement, if necessary.

Respectfully submitted,

**JOHNATHAN YASEVICH,  
et al., PLAINTIFFS**

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SANDRA FRANECKE, DEFENDANTS**

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